

Van W. Northern
NORTHERN LAW FIRM
3545 S. Georgia St.
Amarillo, Texas 79109
SBN: 15101100
(806) 374-2266, (806) 374-9535 FAX
ATTORNEY FOR DEBTOR

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:	§	
Vicki Lee Morley	§	Case no. 24-20341-rlj
	§	
	§	Chapter 7
Debtor(s).	§	

**MOTION TO EXTEND TIME TO FILE DEBTOR'S SCHEDULES
AND CURE THE NOTICE OF DEFICIENCY**

COMES NOW, Debtor, Vicki Lee Morley (hereafter, "Debtor"), and files this Motion to Extend Time to file all remaining schedules, including but not limited to, Schedules, Statement of Financial Affairs, Means Test, and any other required schedules so that Debtor may cure the Notice of Deficiency, and in support would show the court as follows:

1. Debtor commenced this case on December 10, 2024, by filing an emergency voluntary petition for relief under Chapter 7. The 341 Meeting is set for January 16, 2025.
2. Debtor filed the Petition, Creditor Mailing Matrix, Exhibit D (Individual Debtor's Statement of Compliance with Credit Counseling Requirement for each Debtor), Certification of Notice to Consumer Debtors Under Section 342(b) of the Bankruptcy Code, Statement of Social Security Number for each Debtor, and Declaration for Electronic Filing of Bankruptcy, on December 10, 2024.
3. The last date to file Debtor's Schedules, Statement of Financial Affairs, and other schedules and to cure the Notice of Deficiency is December 24, 2024.
4. Debtors have been unable to obtain all required documents so that Debtor's attorney may

prepare Schedules, Statement of Financial Affairs, and any other required schedules to cure the Notice of Deficiency. Therefore, Debtor will be unable to meet the required deadlines of December 24, 2024, to file the remaining schedules.

5. Debtor respectfully requests a seven (7) day extension of time to file their Schedules, Statement of Financial Affairs, and any other required schedules so that Debtor may cure the Notice of Deficiency.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this Motion to Extend Time to File all remaining, required Debtor's Schedules, Statement of Financial Affairs, and any other required schedules, be granted so that Debtor may cure the Notice of Deficiency, for such other relief to which they may be justly entitled.

Respectfully submitted,

NORTHERN LAW FIRM
3545 S. Georgia
Amarillo, Texas 79109
Tel. (806) 374-2266
Fax. (806) 374-9535

/s/ Van W. Northern
Van W. Northern
State Bar No. 15101100
ATTORNEY FOR DEBTOR

CERTIFICATE OF CONFERENCE

On this date, Chapter 7 Trustee, was not available for conference at the time of this filing. Therefore, it should be considered opposed at this time.

/s/Van W. Northern
Van W. Northern

CERTIFICATE OF SERVICE

The undersigned certifies that he has on the date shown below transmitted a true copy of the foregoing document to all parties requesting notice, and all parties in interest, by electronic notification via the court's electronic case filing system or by regular mail on December 23, 2024.

/s/ Van W. Northern _____
Van W. Northern